

Frank Liu

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818-835-0498

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Pro Se Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Frank Liu Plaintiff, vs. The Nielsen Company (US) LLC and TNC US HOLDINGS Defendants.	Case #1:22-cv-09084-JHR-OTW EXHIBIT IN SUPPORT OF Plaintiff's Motion to Lift Stay in Discovery (ECF 106), and Notice of Defendants' Bad Faith Tactics
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EXHIBIT A



F L <frank.liu.96@gmail.com>

Stipulation to Lift Stay in Discovery

F L <frank.liu.96@gmail.com>

Tue, Jan 28, 2025 at 7:02 AM

To: "Spangler, Cardelle" <cspangler@winston.com>, "McCann, Caitlin" <CMcCann@winston.com>

Ms. Spangler and Ms. McCann,

As per ECF 125, the Court recently decided on Nielsen Defendants' motion to dismiss and has allowed three of my claims to proceed. In light of ECF 125, I am reaching out to you to see if Nielsen Defendants will agree to a stipulation to lift the stay in discovery.

Please get back to me as soon as possible. Thank you.



F L <frank.liu.96@gmail.com>

Stipulation to Lift Stay in Discovery

McCann, Caitlin <CMcCann@winston.com>

Tue, Jan 28, 2025 at 12:59 PM

To: F L <frank.liu.96@gmail.com>, "Spangler, Cardelle" <CSpangler@winston.com>

Mr. Liu,

Nielsen does not agree and asks that further communications between the parties be handled by your pro bono counsel.

Best,

Caitlin McCann

Associate Attorney

Winston & Strawn LLP

D: +1 213-615-1802

winston.com

Admitted to practice in California



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F L <frank.liu.96@gmail.com>

Stipulation to Lift Stay in Discovery

F L <frank.liu.96@gmail.com>

Tue, Jan 28, 2025 at 1:20 PM

To: "McCann, Caitlin" <CMcCann@winston.com>

Cc: "Spangler, Cardelle" <CSpangler@winston.com>

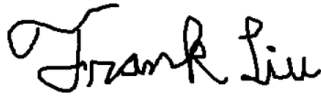
Ms. McCann,

I have not been assigned a lawyer, so I am still pro se.

[Quoted text hidden]

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Exhibit respectfully submitted,

A handwritten signature in black ink, appearing to read "Frank Liu". The signature is written in a cursive, flowing style.

Dated 1/28/2025

Frank Liu

Pro Se Plaintiff